



DEPARTMENT OF THE ARMY
UNITED STATES ARMY GARRISON BENELUX (NSSG)
UNIT 21419
APO AE 09708

IMEU-CHV-LGS

21 Sep 06

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: USAG BENELUX Command Policy Letter # 32, Hazardous Material Tracking, Controlling and Procurement Program within USAG BENELUX Area of Responsibility.

1. References:

- a. AR 200-1, Environmental Protection and Enhancement.
- b. AR 710-2, Supply Policy Below the National Level.
- c. AR 700-141, Hazardous Materials Information Resource System.
- d. DA Pam 200-1, Environmental Protection and Enhancement.
- e. Final Governing Standards (Belgium, Netherlands).
- f. Occupational Safety & Health Administration (OSHA), Part 29 CFR Part 1910.1200.
- g. Army Standing Operating Procedure for the Government Purchase Card Program.
- h. TM 38-410, Storage and Handling of Hazardous Materials.
- i. Hazardous Material Management Program (HMMP) Procedures (Draft).

2. Applicability: This policy pertains to the community, tenant units, agencies and activities within the USAG BENELUX area of responsibility.

3. Purpose: To establish and secure standardized and centralized business practices in the ordering, purchasing, storing and accountability of hazardous materials (HM).

4. With USAG BENELUX supporting the concept of “cradle to the grave” management of hazardous materials, enhanced business practices must be adhered to by all stakeholders. In accordance with the above regulations and in order to effectively control hazardous substances, USAG BENELUX Hazardous Material users will comply with the following:

- a. All personnel who use, handle, or store hazardous materials must attend the initial hazardous material handling course and yearly refresher.

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b. All duly approved requests for hazardous materials will be submitted to the Hazardous Material and Control Center (HMCC). Customers will not purchase Hazardous Material using their own GPC unless coordinated and authorized by the HMCC. USAG BENELUX Command Supply Discipline Program reflects internal controls covering Procurement of Hazardous Materials.

c. HMCC personnel first verify free-issue stock to determine if the order can be filled by that route. If not, they issue the material from stock on hand or order it through the appropriate source making use of the Government Purchase Card (GPC) as a preferred method for local purchases. All hazardous material entering the USAG BENELUX will then be bar-coded at the HMCC prior to distribution and usage. This is where the tracking and accountability begins. The units/users are responsible to keep HMCC Office advised of any locations, inventories and updates of all hazardous materials.


d. Disposition of any excess, outdated or waste hazardous material will be coordinated through the HMCC.

e. Hazardous materials or substances are defined in OSHA 29 CFR 1910.1200 as any chemical which is a physical hazard or a health hazard. Subject publication provides more precise definitions, based on either the chemical potential for burning, exploding, or otherwise causing similar injury to workers, or the likelihood that exposure to it will result in acute or chronic health effects among employees. Any product or chemical with a Material Safety Data Sheet (MSDS) is regulated as a hazardous material. In case of doubt, the principle of caution is advised and prevails over any other principle.

5. As a minimum, yearly inspections and inventories of all activities and locations where hazardous material may be used or stored will be scheduled in accordance with HMMP and local Command Supply Discipline Program (CSDP). It is the responsibility of the USAG BENELUX Hazardous Material Control Center to conduct subject inspections/inventories.

6. Tenant Activities will sign a Memorandum of Understanding (MOU) which outlines both HMCC and unit/organization responsibilities.

7. For further information please call 361-5142.


DEAN A. NOWOWIEJSKI
COL, AR
Commanding

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